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Australia

May 11th 1999

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Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, Maryland 20852

Re: Docket No. 98N-1038, Irradiation in the Production, Processing, and Handling of Food

To whom it may concern:

As an Australian nutritionist with a strong interest in food regulatory matters I have recently become aware of the FDA's proposal to remove requirements for the labelling of irradiated foods. I am very concerned about this for a number of reasons, including that I understand that US decisions on this matter through WTO agreements can impact on future Australian regulations. The Australian public, like the US public, is quite clear that it wants labels to disclose all relevant matters - this currently includes ingredients, additives, origin of the food, use by dates, the inclusion of genetically modified components - and I am confident this desire for labelling would logically extend to declaring when a food is irradiated.

Thus, I support the recommendation by the Center for Science in the Public Interest regarding labelling of irradiated foods: "any foods, or any foods containing ingredients that have been treated by irradiation, should be labelled with a written statement on the principal display panel indicating such treatment. The statement should be easy to read and placed in close proximity to the name of the food and accompanied by the international symbol. If the food is unpackaged, this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale."

Like other labels, irradiation labels are required by FDA to be truthful and not misleading. I believe that the terms "treated with radiation" or "treated by irradiation" should be retained. Any phrase using the word "pasteurization" is misleading because pasteurization is an entirely different process of rapid heating and cooling.

I recognize the radura as information regarding a material fact of food processing. The requirement for irradiation disclosure (both label and radura) should not expire at any time in the future. The material fact of processing remains. Even if some consumers become familiar with the radura, new consumers (eg, young people, immigrants) will not be. The symbol should be clearly understandable at the point of purchase for every one. If there is no label, consumers will be misled into believing the food has not been irradiated.

98N-1038

I also urge you to place the comments received on this FDA proposal on the Internet so that the public, including those in Australia can be informed about who is participating in this comment process and the views they are expressing.

Yours sincerely,

A handwritten signature in black ink that reads "Patricia Carter". The script is cursive and fluid, with the first name and last name clearly distinguishable.

Patricia Carter  
Public Health Nutritionist

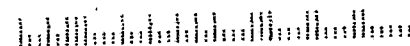
cc     Hon Dean Brown MP, Minister for Human Services, SA Government  
         Michael Woolridge, Federal Minister for Health  
         Dr Andrew Southcott, Federal member for Boothby



AIR MAIL

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